

## Questions/Feedback to Draft Perkins Transition Plan

The Division of Career Education posted to its Web site, April 6-20, 2007, the draft of Missouri's one-year State Plan and collected public feedback before finalizing and submitting it, May 3, to the U.S. Department of Education, Office of Vocational and Adult Education. The plan covers the first (transitional) year of the Carl D. Perkins Career and Technical Education Improvement Act of 2006, which is July 1, 2007 through June 30, 2008. Based on the feedback received, some segments of the draft were clarified or refined. The items below summarize the questions and feedback and includes brief responses from the Division. A copy of the submitted plan can be viewed online at [http://www.dese.mo.gov/divcareered/Perkins/MO\\_Transition\\_Plan\\_050307.pdf](http://www.dese.mo.gov/divcareered/Perkins/MO_Transition_Plan_050307.pdf)

<b>Topics/Comments</b>	<b>Number of Comments Received</b>	<b>Division Response</b>
1. Tech Prep funding	41	A new formula was developed with a base of \$105,000 and remaining funds split 40/60 (total enrollment and postsecondary enrollment).
2. Development of the programs of study appears to be traditional and secondary and/or state driven. Focus on the gap-analysis is an important asset in the plan. Colleges/universities will have difficulty understanding if/how a program of study differs from their degree or certification programs. Need partnership and engagement solicited at the onset.	1	The Missouri Center for Career Education is developing a "model" process for development of programs of study at the local level.
3. What is the deadline for switching to the 16 Career Clusters?	1	There is no deadline.  Career Clusters is the framework by which programs of study will be designed. Career Clusters represent the knowledge and skills, both academic and technical, that all students should achieve based on their personal plan of study.
4. Perkins is all about connections between secondary and postsecondary and transitioning students into and through programs of study which colleges already	1	The Missouri Center for Career Education is developing a "model" process for development of programs of study at the local level.

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<p>have in place. DESE plan remains almost exclusively focused on secondary issues and on a secondary-driven process for programs of study and articulation. That focus does not seem to go far enough in reflecting the intention of the legislation or promoting true partnership in moving students into and through a program of study.</p>		
<p>5. Program of study comments:  How can CTE be responsible for ensuring courses meet postsecondary entrance requirements?  How can CTE incorporate work-based learning as early as 9<sup>th</sup> grade if no vocational programs are funded for 9<sup>th</sup> grade except Agriculture and PLTW?  Could be a question of liability insurance. Some school districts will not cover workman's compensation costs.  Is the state responsible for this or local?  What are the plans to fund CTE at the middle school level? Or is it the responsibility of the career education coordinators?  There may be valid reason for incorporating classes outside a program area.  There is a paragraph that seems to limit the creation of programs of study to Agriculture and Health.</p>	1	<p>The process of developing programs of study involves all parties at the secondary and postsecondary level working together to insure smooth transitions for students.</p> <p>Appropriate work-based learning activities are becoming more of a challenge as schools limit time outside of class. Ninth graders could be exposed through volunteer activities; and the appropriate school organizations might provide some experiences.</p> <p>There are no plans to fund CTE at the middle school level. It is unclear of the relationship of (or the responsibility of the career education coordinators) and plans to fund CTE at the middle school level.</p> <p>The Missouri Center for Career Education is developing a "model" process for development of programs of study at the local level. The pilot only includes Agriculture and Health Sciences but all CTE areas will be required to transition to programs of study at some point in time. Classes outside a program area can be a part of a program of study.</p>
<p>6. There needs to be consistent programs of study across the state for reliable data collection.</p>	1	<p>Consistent programs of study across the state will be a part of the discussion during the development.</p>
<p>7. Who is actually responsible for the development of personal plans of study? Who is accountable?</p>	1	<p>Developing personal plans of study for each student is a responsibility of the Guidance Department. How they are done is up to each school. Some schools will do it expressly through the counselor. In other schools, they may be done in a</p>

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		teacher/advisor program. Since it is an MSIP requirement, the district is accountable. Leadership in this area comes from the Guidance Department.
8. If comprehensive high school counselors are also required to use programs of study, then they would only follow (for Perkins) completers of a sequence (like ACC do), or would they still report all kids who took a vocational class?	1	Perkins IV requires all students who earn one CTE credit to be reported as a participant. Perkins requires all concentrators to be followed up 180 days after graduation. The Perkins IV definition of a concentrator will be “a student who earns 3 CTE credits in a sequence”. This applies to all secondary students whether enrolled in a comprehensive high school or area career center.
9. Will all comprehensive counselors be required to develop personal plans of study focused on career plans? When will this be required and how will it be monitored?	1	MSIP now requires that students have a personalized four-year plan developed no later than 8 <sup>th</sup> grade. The programs of study on which the personal plans of study provide an improved focus in how the personal plans will be developed. The only monitoring currently in place is during an MSIP visit. Monitoring may occur during the Perkins on-site technical assistance visit.
10. Counselor educators should also be included in these in-services.	1	Counselor educators have been added to a list of participants for the development of programs of study and inservice. Thank you for the suggestion.
11. What does emphasis mean for programs of study and integration of academics? Required? How will it be measured?	1	According to Perkins, each local grant recipient is required to implement at least one program of study. No decisions have been made at either the federal or state level as to how programs of study will be required or measured.
12. Is a sequence of Department-approved courses the same as a program of study? And does the sequence need to be in just one program area (or can program areas overlap?)	1	No. No. (Yes.)

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13. Fund Career and Technical Student Organizations.	5	The intent of the Perkins Act is for eligible recipients to use funds to improve career and technical education programs, not individual student activities, efforts, or outcomes. The Perkins Act permits the use of funds to assist career and technical student organizations (CTSOs). Funds may be used to purchase instructional materials/supplies for the CTSO and/or to pay for advisor travel costs. Perkins funds may NOT be used to pay for individual student costs (membership dues, contest participation fees, or student travel expenses).
14. ProStart should be recognized as an occupation and should be eligible for Enhancement Grant dollars.	1	Family-focused consumer science courses (06-04 program types) are not occupational.
15. Not enough money for professional development and salaries.	1	The amount of Perkins funds an eligible recipient uses to support professional development activities and salaries is a local decision. The Department requires each eligible recipient to use at least 5% of their allocation on PD activities.
16. There is still a major concern that many comprehensive high schools with FACS, Ag, PLTW, and Business will be eligible as fiscal agents, so will dilute the amount of dollars currently going to area career centers. Comprehensive high schools cannot offer many of the classes that require large labs (Auto Technology for example) and so can only do so much to improve CTE. What they can do well is the integration component since all teachers are usually located in the same building. But they will not be able to expand into any emerging technology that requires use of large lab spaces or designed with industry specifications.	1	Each school district will be given the opportunity to decide whether they join a consortium or stand alone. If they choose to stand alone, they will be required to sign the assurances and will be expected to provide accountability data.
17. All FACS consumer classes are now approved CTE programs?	1	FACS consumer classes have always been approved CTE programs.

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18. What is related placement for PLTW? Engineering only? That requires college, so this program would not be eligible for an Enhancement Grant? But are eligible for 50/50 program monies?	1	Schools decide the related placement for PLTW, just like they do for any other program area. The law states that only high-demand occupations at high schools, area career centers, and 2-year postsecondary institutions are eligible for Enhancements Grant funds. 50/50 funds are provided for PLTW.
19. The distribution of reserve funds based on enrollments may end up hurting smaller area career centers while benefiting large comprehensive high schools. In the past, the comprehensive high school allocation was capped. Would it still be capped under this formula? Or, would any comprehensive high school that is a Perkins fiscal agent be lumped in with everyone else? In general, if supporting the area career centers with Perkins Federal dollars is not a priority, then basing reserve fund distribution on enrollment may be a way to distribute more dollars to large comprehensive high schools.	1	All secondary eligible recipients (area career centers and comprehensive high schools) are allocated reserve funds. The Division utilizes a formula based on career education student enrollment rates to distribute the reserve funds. There is no cap on the allocation an eligible recipient may receive. This manner of distributing the reserve funds supports all career education programs (area career centers and comprehensive high schools). The eligible recipients with high numbers of career and technical education students will be allocated more of the funds.
20. Aren't promotional materials on the unallowable list (improvement and expansion)?	1	Yes.
21. Add CDA to the list of industry certifications.	1	Thank you for the suggestion.
22. Can NOCTI test levels be used for a certification credential?	1	No decisions have been made regarding technical assessments.
23. Allow schools and programs to choose their own national certifications.	1	Schools and programs can choose their own national certifications.
24. Will the Ready to Work certificate be required for ACCs and comprehensive high schools? Does it require the purchase of WorkKeys? If so, who will pay for that ACT system?	1	The Ready to Work initiative is voluntary. It does not require the purchase of WorkKeys.

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25. ServeSafe should also be mentioned with industry certifications.	1	ServSafe has been added to the industry certifications. Thank you for the suggestion.
26. Where is the definition of a completer?	1	The Office of Vocational and Adult Education only used the terms “participant” and “concentrator” for Perkins IV.
27. These are very general descriptions (as well as COE on page 13) and seem to cover almost any kind of course/employment/postsecondary major; is that what is meant? So, all is vocational and all is related?	1	These are generic program descriptions that are meant to be inclusive of all secondary and postsecondary programs.
28. Does the postsecondary definition of retention change with the new Perkins? For certificated programs (i.e. LPN), we used to count dropouts as any student who had not completed 500 hours and then dropped out.	1	Retention of postsecondary students will change in Perkins IV. Number of clock hours to become a participant has not been decided.
29. Technology education has not been vocational in the past and this could be just a description of what the State CTE does now? However, is this included in here in order to cover PLTW as an approved CTE program?	1	The State Transition Plan includes descriptions of all programs and services that are provided by the Division regardless of whether they are funded by state or federal dollars.
30. Will rigorous academic core be defined (i.e. graduation requirements met)?	1	According to Perkins IV, the challenging academic content standards and student achievement standards are to be what states adopted for No Child Left Behind. For Missouri, it is the Show-Me Standards.
31. Will the definition of concentrator hold true for all comprehensive high school approved programs as well as area career centers?	1	Yes.
32. The Biomedical will be another program approved as TE? Seems to require college, so the same questions as with PLTW.	1	Most likely, the Biomedical program will be approved as a Health Sciences program. Schools will decide the related placement for Biomedical Sciences, just like they do for any other area. The law states

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		that only high-demand occupations at high schools, area career centers, and 2-year postsecondary institutions are eligible for Enhancement Grant funds.
33. Term vocational/technical used in a few places in the State Plan.	1	The term is unavoidable when it references a federal agency or legislation. The on-line application for Fiscal Year 2008 will reflect new terminology.
34. The terminology of high-demand occupations is not in line with the new Perkins for high-skill/high-wage/emerging technology language is amended and included.	1	As has been said several times, there will be a conversation around high-demand for Perkins and the Enhancement Grant, with the outcome being the same for both.
35. Will superintendents be required (and told) that the findings must be used in the district's CSIP?	1	Any requirements for MSIP will be communicated to district superintendents.
36. If all transcripts of CTE kids need to be analyzed for reporting the rigorous core, this will require more data person-power in every district with CTE programs.	1	Ok.
37. Add emerging technologies to the identification of high-wage/high-demand/high-demand occupations.	1	Perkins legislation states high-demand, high-wage, or high-skill.
38. What changes are envisioned for reporting academic achievement with end-of-course exams (as the MAP goes away)? This could be a data-gathering nightmare. Preparation for this change is essential to plan for.	1	Don't know yet.
39. NCA districts exempt from local program quality standards and local district requirement to include findings in their CSIP.	1	Division staff has met with representatives from MCCTA to develop a process that would meet the needs for both MSIP and NCA. A second meeting to continue this discussion will be held in the near future.
40. When MAP changes to end-of-course exams, will this all change for the 5-year State Plan submission? The	1	Decisions have not been made regarding end-of-course exams. As decisions are made and information is available, local

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use of the 50 subset for disabilities and ELL students will help some districts and hurt others? Is there a way to mitigate these differences? What about how the students in sending schools (that we never see) will affect our data/accountability?		districts will be informed.  More than likely, revisions will have to be made to the State Plan with the change in assessments. The subsets for disabilities and ELL students mirror No Child Left Behind. The subset numbers will be reviewed.
41. Has the local program quality standards document been adopted and approved by MSIP? NCA districts exempt?	1	MSIP does not adopt or approve local program quality standards. Division staff has met with representatives from MCCTA to develop a process that would meet the needs for both MSIP and NCA. A second meeting to continue this discussion will be held in the near future.
42. Are the counts for enrollment based on head counts or credit hour counts? What number (type of count) was used as the denominator?	1	Unclear as to what is being asked.
43. How will academic attainment change with end-of-course exams?	1	Use of different assessment tests.
44. Do we now count as dropouts any student enrolled on the first day, and who then dropped the program?	1	Retention of postsecondary students will change in Perkins IV. Number of clock hours to become a participant has not been decided.
45. Will there be input from the directors into the application scoring rubric?	1	There isn't a scoring rubric for the annual on-line application. If the intent of the question is regarding the 5-year plan, then the answer is yes, there will be a scoring rubric and yes, we will ask for input.
46. A Department-wide application process sounds good, but may be unreachable due to the many nuances within Departments. Does the Perkins Act require this to be done? Or, the state wants it done and wants to use Perkins money to support it? What implications does it really have for local recipients?	1	The purpose of eGrants is to create a seamless planning and submission process for school districts, other educational institutions, and DESE so there is a comprehensive plan and consistent application process to provide information for budgets and school improvement planning. This process should be as simple as possible while meeting State and Federal



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		requirements.
47. Many directors still feel the NCA accreditation process should take precedence over this 58-page document. If this is approved in the State Plan, where does that leave NCA districts?	1	Division staff has met with representatives from MCCTA to develop a process that would meet the needs for both MSIP and NCA. A second meeting to continue this discussion will be held in the near future.
48. A request to give at least a 6-week window for input into anything with notice going out to all involved stakeholders.	1	Final State Plan guidelines were received March 12, 2007. The Transition Plan was to be submitted May 7, 2007. The Transition Plan was posted March 18 – April 20. All stakeholders were notified to provide input.
49. Are superintendents informed of the emphasis on embedded credit? What is a CTE Director to do with this if their district is resistant?	1	Embedded credit is one of several strategies that school districts can use to offer students academic credit. Embedded credit is not and will not be a required from the Department. It is a local decision as to whether this strategy is used for awarding academic credit.
50. Embedded credit is mentioned in MSIP as one of 12 possibilities for assisting students into postsecondary education or the workplace. Will it become a required element of MSIP? It seems to be implied?	1	Embedded credit is one of several strategies that school districts can use to offer students academic credit. Embedded credit is not and will not be required from the Department. It is local decision as to whether this strategy is used for awarding academic credit.

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<p>51. How many CTE administrators/teachers were involved in R-Factor or Algebra training? Why is CTE money being spent on 9<sup>th</sup> grade Algebra teachers? It would seem that these initiatives could better impact TE more if they were targeted to integration of academics and teams of CTE and core teachers worked together during the training. This might also impact embedded credit across districts as well. The RPDCs do not seem to offer much direction at the improvement of CTE, and this might help them be able to do so. The 8 career education coordinators, located at RPDCs, could have a larger influence in the development of these activities as well. Also, how many career centers versus comprehensive high schools actually use VTECs? What amount of vocational dollars goes into this project? For whose use?</p>	<p>1</p>	<p>The “Transitions to Algebra” training was not intended for CTE educators, but was tailored for Mathematics teachers from both high school and middle schools. The design was to assist school districts to develop a course for those students which were entering the 9<sup>th</sup> grade without the skills necessary to successfully take Algebra I.</p> <p>This activity is based on the 2006 “HSTW” Assessment results for Missouri. Fewer CTE students graduate from high school with Algebra I on their transcript. This fact has probable correlation to the fact that the average Math score of CTE students completing the “HSTW” Assessment was roughly one-half of a grade level below the non-CTE portion of their cohort class.</p> <p>More than 2,000 high school seniors in Missouri took the HSTW assessment during their final semester, with 62 percent of those assessed being CTE students, representing urban, suburban, and rural districts in Missouri. The findings of that assessment include:</p> <ul style="list-style-type: none"> <li>• A higher percentage of CTE students were assessed at “Below Basic” compared to non-CTE students.</li> <li>• CTE students who took Math classes comprised of Basic Mathematics, General Mathematics, Consumer Mathematics, or Business Mathematics had a mean Math assessment score 1½ grade levels lower than “Basic”.</li> <li>• Slightly more than one-half of the assessed CTE students had taken Algebra I, and their mean Math assessment was nearly a full grade level higher than “Basic” and a quarter of the way to “Proficient”.</li> </ul> <p>As CTE curriculum becomes more rigorous to meet the needs of</p>

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		<p>the modern economy, students will need to have a solid academic foundation in order to successfully complete their respective program of study. The funding of the “Transitions to Algebra” training illustrates one way to allow those students entering high school without the skills necessary for such a foundation to become ready by the time they enter CTE studies.</p> <p>VTECS products, both Direct and Connect, are available to all schools free of charge. Division staff continues to work to get more schools on board in using the software.</p>
52. Is there a plan for how 8 regional career education coordinators can really impact statewide, for example, having them housed at the RPDCs?	1	The CECs are under the direction of MCCE. They are working on a statewide focus for their work. There are no plans to have them housed at the RPDCs.
53. Where is all of the specifics that Shawn Brice worked on with VREs across the state? This was an excellent document and it is surprising it is not used.	1	This portion of the Transition Plan was revisited with additional information added in where appropriate.
54. Very comprehensive plan.	2	Thank you.
55. Consider having stakeholder meetings first as the primary source to develop requirements then the web for feedback.	1	It will be considered.